

Form G-3 (20241101)

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
DIVISION

In re: CHICAGOLAND GUNS & RANGE,) Chapter 11 ☐
LLC)
) No. 23-81055
)
Debtor(s)) Judge Thomas M. Lynch ☐

NOTICE OF MOTION

TO: See attached list

PLEASE TAKE NOTICE that on May 21, 2025, at 11:00 a.m. ☐, I will appear before the Honorable Thomas M. Lynch ☐, or any judge sitting in that judge's place, **either** in courtroom 3100 of the Stanley J. Roszkowski United States Courthouse ☐, 327 South Church Street, Rockford, IL 61101 ☐ **or** electronically as described below, and present the motion of CHICAGOLAND GUNS & RANGE, LLC [to/for] Amended Motion for Final Decree and Certificate of Subs, a copy of which is attached.

Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.

To appear by Zoom using the internet, go to this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

To appear by Zoom using a telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

Meeting ID and passcode. The meeting ID for this hearing is 160 291 5226, and the passcode is 852255. The meeting ID and passcode can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

By: /s/Andrew J. Mertzenich, Attorney

CERTIFICATE OF SERVICE

I, Andrew J. Mertzenich,

☒ an attorney, certify

- or -

☐ a non-attorney, declare under penalty of perjury under the laws of the United States of America

that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method shown on May 16, 2025, at 9:00am *

/s/ Andrew J. Mertzenich

[Signature]

*All applicable boxes must be checked and all blanks filled in.

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:	⋮	
CHICAGOLAND GUNS & RANGE, LLC	⋮	Docket: 23-81055
Debtor.	⋮	Chapter 11
	⋮	Hon. Thomas M. Lynch

**DEBTOR'S AMENDED MOTION FOR ENTRY OF FINAL DECREE
AND
CERTIFICATE OF SUBSTANTIAL CONSUMATION**

The Debtor, CHICAGOLAND GUNS & RANGE, LLC by and through its undersigned attorney, pursuant to Federal Rules of Bankruptcy Procedure 3022, and Local Rule 3022-1, moves for the entry of a Final Decree closing this Chapter 11 Bankruptcy Case and in support states as follows:

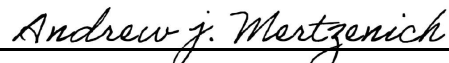
- 1) The Order Confirming Plan of Reorganization (Doc. No. 110) (the "Order") was entered on 06/21/24.
- 2) The Status of Payments due each class and interest under the Plan is as follows as of the date of presentment of this Motion:
 - a) Administrative Claims:
 - i) The Administrative Claim of Karen Porter, former attorney for debtor, is currently subject to a payment arrangement and payments are set to commence on June 1.
 - ii) The Administrative Claim of Kenneth C. Polhammus Trust's post-petition interest has been paid in full.
 - iii) The Administrative Claim of the Subchapter V Trustee is currently subject to a payment arrangement and payments are set to commence on June 1.
 - b) Class One Allowed Secured Claim to the Kenneth C. Polhammus Trust:

- i) Payments to this Class have commenced.
- ii) Monthly payments under the Plan are current.
- c) Class Two Unsecured Claims:
 - i) Payments to this Class have commenced.
 - ii) Quarterly payments under the Plan are not current; but the debtor has arranged payment through their approved accountant/trust agent that will bring payments current under the plan.
- 3) Contested and Adversary Proceedings have been resolved.
- 4) By the foregoing reasons, the case has here been substantially consummated. Debtor's counsel has notified all creditors of the estate of the scheduled hearing for final decree in this matter, as per the Certificate of Service. A proposed Order is appended to this Motion.

WHEREFORE, Debtor prays for entry of a final decree closing this Matter, granting the Debtor a discharge pursuant to 11 USC § 1141(d)(1), and for such other relief as the Court deems just.

Dated: May 14, 2025

Respectfully Submitted,



Attorney Andrew J. Mertzenich

Counsel for Debtor

The Law Office of Andrew J. Mertzenich

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